

Roger Gold, Esq. [SBN 214802]
rgold@rgoldlegal.com
Cecil B. Crain [SBN 252780]
ccrain@rgoldlegal.com
Mia Mattis [SBN 191027]
mmattis@rgoldlegal.com
GOLD LAW FIRM
555 Montgomery Street, Suite 605
San Francisco, CA 94111
Tel: (415) 986-1338
Fax: (415) 373-4579

H.W. Trey Jones (SBN 237607)
SARAH N. JONES (SBN 267525)
JONES & BENDON LLP.
2251 Hidalgo Ave
Los Angeles, CA 90039
Trey@treyjoneslaw.com

Attorneys for Plaintiffs
ROSEMARY ELORREAGA, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROSEMARY ELORREAGA, individually and
as Successor-in-Interest to ROBERTO
ELORREAGA; ROBERT PAUL
ELORREAGA; RICHARD ANDREW
ELORREAGA, and RONALD EDWARD
ELORREAGA,

Plaintiffs,

vs.

ABB, INC., et al.,

Defendants.

Case No: 4:2-cv-05696-HSG

**STIPULATION AND ORDER TO
EXTEND FACT DISCOVERY CUT-
OFF TO TAKE THE DEPOSITION OF
EXPERT ROY BELANGER**

Judge: Hon. Haywood S. Gilliam, Jr.

Complaint Filed: September 23, 2020

Date Removed: July 26, 2021

Trial: October 31, 2022

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

Plaintiffs noticed the deposition of Defendant ViacomCBS Inc., f/k/a CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation's ("Westinghouse") expert

Roy Belanger to take place before the expert discovery deadline in this matter. The parties stipulate that the deposition of Roy Belanger can take place after the June 8, 2022, expert discovery cutoff. The extension applies only to the deposition of Roy Belanger pursuant to FRCP 30(b)(6). This extension will not impact other deadlines in the Scheduling Order.

Dated: June 3, 2022


/s/H.W. Trey Jones
H.W. Trey Jones
Attorneys for Plaintiffs

Dated: June 6, 2022

/s/ Kevin D. Jamison
Kevin D. Jamison
Attorney for Paramount Global, et al.

IT IS SO ORDERED.

Dated: June 7, 2022


Hon. Haywood S. Gilliam, Jr.
U.S. District Court Judge